

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

<u>In re:</u>	:	CHAPTER 7
	:	
THOMAS F. UPDEGROVE, JR.	:	BANKRUPTCY NO. 24-10637(PMM)
	:	
Debtor	:	
	:	
<u>CHRISTINE C. SHUBERT, in her</u>	:	
capacity as the Chapter 7 Trustee for the	:	
Estate of THOMAS F. UPDEGROVE, JR.	:	
	:	
Plaintiff	:	
	:	
v.	:	ADVERSARY NO. 24-00063(PMM)
	:	
AMERICAN GENERAL LIFE	:	
INSURANCE COMPANY	:	
	:	
Defendant	:	
	:	

**PRAECIPE TO WITHDRAW COMPLAINT OF CHRISTINE C. SHUBERT, CHAPTER  
7 TRUSTEE, FOR TURNOVER OF PROPERTY OF THE DEBTOR'S ESTATE  
PURSUANT TO 11 U.S.C. § 542 FILED ON APRIL 18, 2024 WITH PREJUDICE**

TO THE CLERK OF THE COURT:

Kindly withdraw the Complaint of Christine C. Shubert, Chapter 7 Trustee, for Turnover of Property of the Debtor's Estate pursuant to 11 U.S.C. § 542 filed on April 18, 2024 with prejudice.

**KARALIS PC**

By: /s/ Robert W. Seitzer  
ROBERT W. SEITZER  
1900 Spruce Street  
Philadelphia, PA 19103  
(215) 546-4500  
[rseitzer@karalislaw.com](mailto:rseitzer@karalislaw.com)

*Counsel for the Plaintiff/Trustee*

Dated: June 4, 2024